

**REMARKS/ARGUMENTS**

Claims 1, 13, and 22 have been amended by this response. No new matter has been introduced. Illustrative embodiments of the claimed invention as recited in the amended claims are shown, for example, in Figs. 2 and 3, and disclosed in ¶¶[0020]-¶¶[0029] of the application as published. Claims 4, 25, 32, and 33 have been canceled without prejudice. No new claims have been added. Following entry of these amendment and remarks, claims 1-3, 5-24, and 26-31 will remain pending for examination.

Claims 1-33 were rejected under 35 U.S.C. §102(e) for allegedly being anticipated by Blumenau et al., U.S. Patent Pub. No. 2007/0083657 (hereinafter "Blumenau"). However, Blumenau does not teach and every single feature element of these claims.

Version Information

Claim 1 recites in part:

...  
obtaining manufacture-related information associated with the sending device;  
and  
    responding to the sending device in a positive manner or in a negative manner based on a comparison of the manufacture-related information with manufacture-related information contained in an access control table, wherein the comparison includes comparing version information included in the manufacture-related information associated with the sending device against version information included in the access control table, wherein responding in a positive manner or a negative manner depends on an outcome of the comparison,  
    wherein responding in a positive manner will permit subsequent data communication between the first device and the sending device,  
    wherein responding in a negative manner will prevent subsequent data communication between the first device and the sending device.

That is, version information from a target device is compared to version information stored in the access control table. Based upon this comparison, a positive or a negative response is produced and access by the target granted or denied. Blumenau does not teach these claimed features.

Blumenau is directed to managing access to storage in a storage system. Blumenau teaches identifying host bus adapters (HBAs) with world wide names (WWNs). (Blumenau, Fig. 3 and ¶[0062]). The WWNs are listed in a transient filter table that indicates

which volumes the HBA has access to. (Blumenau, Fig. 3, ¶[0062] and ¶[0065]). The transient filter table is used to control accesses to disks. (Blumenau, Fig. 3, ¶[0063] and ¶[0065]). The transient filter table contains the WWN associated with the HBA, a sharing flag, and a logical unit number (LUN). Notably, the transient filter table does not contain version information:

[A] filter table 76 is provided for controlling which HBAs have access to which of the LUNs. The filter table 76 is generated using the volume allocation and mapping information and includes a record for each HBA coupled to any of the ports of the storage system. An example implementation of the filter table 76 is provided in FIG. 4. Each record 76a - 76n includes the WWN associated with the HBA, a flag indicating whether the volumes allocated in this entry are shared, and a LUN. (Blumenau, ¶[0058]).

Blumenau also teaches a transient filter table consisting of LUNs, ports, and a mapping of HBAs to ports. Notably, there is no disclosure of the idea of version information:

The transient filter table 84 is shown to include an array of records, such as record 400. One column of records is provided for each LUN in the storage system (e.g., storage system 20 in FIG. 3) numbered in FIG. 5 as LUN 0 to LUNx, where x+1 is the number of LUNs in the storage system. One row of records is provided for each port at the storage system. Each record includes a bitmap 402. The bitmap includes a number of bits corresponding to the maximum number of devices (HBAs) that can access each port. In FIG. 5, these bits are indicated as D1, D2 ... Dn, where n is the maximum number of devices that may be coupled to any port. (Blumenau, ¶[0067]).

Similarly, Figs. 4 and 5 are devoid of version information.

Clearly, Blumenau does not teach having version information in the filter table. Accordingly, Blumenau does not teach determining access to disks based on version information in the filter table. Hence, Blumenau does not teach, either implicitly or even impliedly, the claimed "responding . . . based on a comparison . . . wherein the comparison includes comparing version information included in the manufacture-related information associated with the sending device against version information included in the access control table, wherein responding in a positive manner or a negative manner depends on an outcome of the comparison, wherein responding in a positive manner will permit subsequent data communication between the first device and the sending device, wherein responding in a negative manner will prevent subsequent data communication between the first device and the sending device."

For at least the foregoing reasons, Blumenau does not anticipate all the features of Applicant's claim 1. Accordingly, Applicant respectfully requests that the rejection of claim 1 be withdrawn. Independent claim 22 recites features that are substantially similar to independent claim 1, and thus is believed to be allowable for at least the same rationale as discussed for claim 1.

Dependent claims 2, 3, 5-12, 23, 24, and 26-31 depend from independent claims 1 and 22, and are thus believed to be allowable for at least a similar rationale as discussed for claims 1 and 22, and the additional limitations that they recite.

#### Allowed Tasks

Claim 13 recites in part:

...  
based on the identifying information determining which of the services are associated with the second storage network device;  
performing the service request when the service request is for a task which is associated with the second storage network device; and  
sending a negative response to the second network storage device that the task will not be performed by the first storage network device when the service request is not for a task which is associated with the second storage network device.

That is, service requests are performed by a device (i.e., the first storage device) when the requestor (i.e., the second storage device) is allowed to perform that particular service. Some services may be allowed and others not. (Figs. 4A-B, ¶[0034]-¶[0043] and ¶[0046]-¶[0047]). In addition, the claimed invention sends a negative response to the requestor when a service will not be performed. (¶[0029]).

In contrast, Blumenau teaches that an HBA either has access to a volume or it does not, appropriately denoted by a single bit:

If the bit in the LUN map associated with the addressed LUN indicates that the HBA has access to the LUN, the request is forwarded to the disk adapters 36a - 36d for servicing. If not, the request is ignored. (Blumenau, ¶[0065]).

Blumenau does not teach the allowing or denying of particular services. Blumenau teaches only granting or withholding access to a volume. If a volume is allowed access, then all services can be performed. If a volume is denied access, then no services can be performed.

Moreover, if access is not allowed, the request is simply ignored. Blumenau does not teach the act of *sending* a negative response. Hence, Blumenau does not teach or suggest the claimed “performing the service request when the service request is for a task which is associated with the second storage network device” and “sending an appropriate negative response to the second network storage device that the service will not be performed.”

For at least the foregoing reasons, Blumenau does not anticipate all the features of Applicant’s claim 13. Accordingly, Applicant respectfully requests that the rejection of claim 13 be withdrawn. Dependent claims 14-21 depend from independent claim 13, and are thus believed to be allowable for at least a similar rationale as discussed for claim 13 and for the additional limitations they recite.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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